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PROPOSED ATTORNEYS FOR
TONY ALTON PENNINGTON
Debtor AND Debtor IN POSSESSION

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

IN RE: §
§ CASE NO. 22-20025-RLJ-11
TONY ALTON PENNINGTON, § (Chapter 11)
§
§
Debtor. §

MOTION FOR EXPEDITED HEARING AND/OR SPECIAL SETTING

Tony Alton Pennington, debtor and debtor in possession (the “Debtor”) file this *Motion for Expedited Hearing and/or Special Setting* regarding the *Motion of Debtor to Extend Automatic Stay* (Docket No. 12) (the “Motion to Extend Stay”), and in support thereof would show to the Court the following.

1. On February 10, 2022, Debtor filed the Motion to Extend Stay.
2. Requested hearing date and objection deadline: The Debtor respectfully requests that the Court set an expedited hearing regarding the Motion to Extend Stay on **March 10, 2022**.
The time estimate for the hearing is ten (10) minutes or less.
3. Reason for expedited hearing: A hearing is necessary under the Code § 362 framework and timing for extending the automatic stay.
4. Notice is sufficient. Setting an expedited hearing on March 10, 2022, provides sufficient notice taking into consideration the number of days remaining until such date (at least twenty (20) days as the date of the filing of this motion).

5. Reason hearing not requested sooner. A hearing was requested as soon as the Motion to Extend Stay was filed.

WHEREFORE, Tony Alton Pennington, debtor and debtor in possession, respectfully requests that the Court set an expedited hearing regarding the Motion to Extend Stay on **March 10, 2022 at 1:30 p.m.** by Webex. The Debtor respectfully requests such other and further relief to which the Debtor is entitled at law or in equity.

Dated: February 18, 2022

Respectfully submitted:

WEYCER, KAPLAN, PULASKI & ZUBER, P.C.

By: /s/ Jeff Carruth

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DEBTOR AND DEBTOR IN POSSESSION

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was served on February 18, 2022 to all parties appearing in the attached address list (i.e. mailing matrix) obtained from the Court's PACER facility as attached below.

/s/ Jeff Carruth
JEFF CARRUTH

SERVICE LIST		Case No. 22-20025-RLJ-11	In re: Tony Alton Pennington					Method of Service / Comment
Name		Address1	Address2	City	State	Zip	Email	
Ally Financial		AIS Portfolio Services, LP	4515 N Santa Fe Ave. Dept. APS	Oklahoma City	OK	73118-7902		Regular mail
Ally Financial		Attn: Bankruptcy	PO Box 380901	Bloomington	MN	55438-0902		Regular mail
American Express National Bank		c/o Becket and Lee LLP	PO Box 3001	Malvern	PA	19355-0702		Regular mail
Amex		Correspondence/Bankruptcy	PO Box 981540	El Paso	TX	79990-1541		Regular mail
Attorney General		Texas Child Support SDU	PO Box 659791	San Antonio	TX	78265-5792		Regular mail
Blue Juniper Trust		Systems & Services Technologies, Inc.	4315 Pickett Road,	St. Joseph	MO	64503-1601		Regular mail
Capital One		Attn: Bankruptcy	PO Box 30285	Salt Lake City	UT	84130-0286		Regular mail
Davis Law Firm		1600 Lomas Blvd		Albuquerque	NM	87102-2713		Regular mail
Ford Motor Credit Corporation		PO BOX 62180		COLORADO SPRINGS	CO	80962-2182		Regular mail
Hopper Pump & Drilling		1002 Pine Hodge Rd		Roswell	NM	88201-9440		Regular mail
Internal Review Service		PO Box 7346		Philadelphia	PA	19101-7346		Regular mail
Lincoln Automotive Fin...		Attn: Bankruptcy	PO Box 542000	Omaha	NE	68154-8001		Regular mail
New Mexico Tax & Revenue Dept		1100 5 St Francis Dr		Roswell	NM	88203		Regular mail
Rachel Pennington		3803 Lynette Dr		Amarillo	TX	79109-5637	[reserved]	Direct email
Terra Abellana		1890 County Road 1790		Sunset	TX	76270-5329		Mail
Terra Abellana		c/o Blackwell Law Fir, LLP	703 S. Van Buren	Amarillo	TX	79101-2236	[legalbf@blackwellfirm.net]	Direct email
Tony Alton Pennington		3803 Lynette Dr		Amarillo	TX	79109-5635	[reserved]	Direct email
United States Trustee		1100 Commerce Street	Room 976	Dallas	TX	75242-0997		ECF
		SubChapter V Trustee					TBD	TBD

PROPOSED ORDER

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

ORDER SETTING HEARING (RE: DOCKET NO. 12)

The Court shall conduct a final hearing regarding the *Motion of Debtor to Extend the Automatic Stay* (Docket No. 12) on the date and time set forth on the docket of this case and/or at the top of this Order. The hearing will be conducted by and through the WebEx video and audio facility of the Court. Debtor is responsible for notice.

###END OF ORDER###